

1 **GUAM LEGAL SERVICES CORPORATION**  
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4 *Counsel for Plaintiff.*

**FILED**  
DISTRICT COURT OF GUAM  
**FEB 26 2003**

MARY L. M. MORAN  
CLERK OF COURT

8

7  
8 **IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF GUAM**

9 **CARMEN KATHERINE RODRIGUEZ,**

10 Plaintiff,

11 vs.

12 **JOSEPH E. MASTERS,**

13 Defendant.

CIVIL CASE NO. CV02-0033

**NOTICE OF MOTION AND  
MOTION TO WITHDRAW AS  
COUNSEL OF RECORD and  
MEMORANDUM OF POINTS  
AND AUTHORITIES**

14  
15 **NOTICE OF MOTION**

16 PLEASE TAKE NOTICE that on MAR 03 2003, 2003 at 2:00 o'clock  
17 P.m., or as soon thereafter as counsel may be heard, the undersigned will move the Court  
18 to Withdraw as counsel of record for Plaintiff, **CARMEN KATHERINE RODRIGUEZ.**

19 **Guam Legal Services Corporation**, moves this court for permission to withdraw as  
20 counsel of record for the Plaintiff based upon GR 19.1c and the Model Rules of Professional  
21 Conduct, Memorandum of Points and Authorities below and the Declaration of Daniel S.  
22 Somerfleck, filed contemporaneously herewith.

23 EXECUTED this 26 day of February, 2003.

24 **GUAM LEGAL SERVICES CORPORATION**  
Attorneys for Plaintiff.

25  
26  
27 By:

  
28 **DANIEL S. SOMERFLECK**  
Director

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Guam Legal Services Corporation ("GLSC") brings this Motion to Withdraw as Counsel of record for the Plaintiff, pursuant to GR 19.1 (c):

An attorney may withdraw from an action or proceeding only by leave of court for good cause shown, and after serving written notice in advance to the client and to all other parties who have appeared in the case.

That in the Codes of Professional Responsibility Rule 1.6 regarding Declining or Terminating Representation, states that:

(b) Except as stated in paragraph (c), a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if:

(3) a client insists upon pursuing an objective that the lawyer considers repugnant or imprudent;

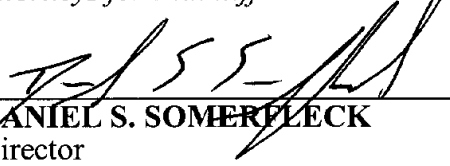
(6) other good cause for withdrawal exists.

Counsel submits that good cause exists in the case, as put forward in the Declaration of Counsel, and respectfully requests leave to withdraw as counsel for the Plaintiff.

**EXECUTED** this 26 day of **February, 2003**.

**GUAM LEGAL SERVICES CORPORATION**  
*Attorneys for Plaintiff.*

By:

  
**DANIEL S. SOMERFLECK**  
Director